

United States Court
Southern District of Texas
FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

JUN 18 2008

Michael N. Milby, Clerk of Court

AHMAD JEBRIL
PLAINTIFF,
V.
DAN JOSLIN, ET AL.,
DEFENDANTS, /

Civil Action #: C-07-436

**PLAINTIFF'S RESPONSE TO DEFENDANT'S (motion to
dismiss for failure to exhaust administrative
remedies)**

COME NOW plaintiff "inmate" Ahmad Jebril, Pro Se to provide the following response to Defendants motion to dismiss:

1) Plaintiff fully agrees and has full knowledge that an inmate must fully exhaust administrative remedies prior to filing a Bivens Civil rights Lawsuit according to the PLRA.

2) The Hon. Magistrate Brian Owsley retained my claim of retaliation and 1st amendment claims of violation of religious rights; namely, uncuffing my pants.

The administrative remedy filed in Milan, FCI and the procedure in following up on it to exhaust it continued on from Three Rivers FCI after my transfer.

The remedy relates to discrimination due to my religious beleif. The fact that it started in Milan FCI and continued while I was in Three Rivers, where the response to the BP-11 was returned to me 3 months after my arrival to Three Rivers FCI are enough to show that it covers matters of dscrimination both in Milan and Three Rivers FCI.

I specifically stated in the first line of the BP-9 that (I have been discriminated at in Milan FCI because I'm a knowledgeable practicing Muslim.....)

That encompasses both claims that the Hon. Judge Brian Owsley retained.

In the order to dismiss certain claims and retain case the Hon. Judge Brain Owsely correctly states (Plaintiff claims that based on information from FCI-Milan about his religious beliefs and practices, defendants were suspicious of his actions upon his arrival to FCI-Three Rivers. He claims that, but for his religious practices, defendants would not have ordered the harassment or allowed it to continue).

Therefore the issue in the documented grievance process attached as an exhibit to my original complaint (docket No. 8) encompasses both what happened in Milan and continued on with more severity in Three Rivers, FCI.

3) Upon my arrival to Three Rivers, TX staff and namely respondents began to harass me in every single way possible.

One of the ways was by refusing to give me forms to file administrative remedies against them.

As defendants clearly stated the administrative remedies are to be filed on requisite BOP forms that cannot be copied because they are distinct, colored, and carboned pages.

Staff refused to give me any forms! This was a deliberate attempt at avoiding matters getting to region, BOP Washington and/or filing a lawsuit.

FORMS CAN ONLY BE OBTAINED FROM CERTAIN STAFF and they are not sold or placed in public areas where inmates have easy access to them.

I attempted to obtain the BP-8 numerous times prior to filing my lawsuit but was always turned away.

One time I asked my unit manager for a BP-8 she asked me why? I informed her of a certain staff harassing me. She said(I don't believe you) and refused to give me any forms.

On another occasion she asked me why? I told her regarding the officer who works the shack area he harasses me and is terrifying when I pass through. She refused to give me a form stating that prior to her giving me the form I need to go settle it with the officer. I asked her (you want me to go confront that officer who when I don't say anything harasses me and terrifies me... you will be responsible if anything happens). She refused to give me the forms and I did not confront the officer.

On another occasion I asked for forms she asked what it was regarding and I stated the Warden and Captain. She said before I give you the forms you need to attempt to resolve the matter with their bosses. I asked who is their bosses. She said BYE... waving me out of her office.

There was other occasions of staff refusing to give me the forms.

Defendants cannot refuse to give out forms then claim that you need to exhaust administrative remedies to get the matter to court. By that the staff will control what gets to court and what does not and that defeats the purpose.

Had forms been placed in public or sold in the store it would be understandable to dismiss the case for not exhausting the grievance procedure. But the staff here refused to give me the proper forms. Therefore, it is impossible to justly dismiss a lawsuit for not filing the remedies on special forms when they hold on to them.

4) I wrote Warden Joslin a cop-out available in public areas documenting the staff harassing me in giving me the forms. The Warden never responded just like he never responds to any of my concerns. Please see exhibit #1 and #2.

5) To show my clear intentions I approached both respondents less than two weeks after I arrived to help me they began to treat me worse.

6) I then had no choice but to write the letter to the warden(see Docket #8 Exhibit #3) after I was unable to get the forms and he never responded.

I then proceeded with the lawsuit after matters continued to get worse as they continue to every single day.

7) I then met inmates from other buildings and began to ask them to ask their staff to get me some BP-8's (the special administrative remedy forms) after I filed the lawsuit and some inmates began to get me some from staff outside my unit.

I can only obtain the forms from "certain" staff in my unit.

I then began to file the remedy forms inmates brought me.

Had I not been sincerely eager to attempt to exhaust the internal grievance procedure I would not pursue the matter and attempt to find any way to obtain the forms and file them after filing the lawsuit.

Even though I should not have to ask favors of inmates to get me the forms when staff are to give them to me.

8) Months later there was staff change and Mr. Peres began to give me the forms without any delay or any problems. His superior Ms. Kelley continues to avoid giving me any forms.

9) In December I filed 13 Bp-9(to the warden) he returned them all to me on the technical issue that I need to file a Bp-8 for each one.

I then went back and filed a BP-8 for each and every one they were signed and returned to me.

I then needed 10 BP-9's. I went to staff to get them and was unable to. I was finally able to get some inmates to get them for me. Mr. Peres was still not in charge of our unit at that time. By the time I collected the BP-9 and filed them they were all rejected on a technical issue that there was a gap of over 20 days between filing the BP-8 and the time the BP-9 was filed.

They were all returned to me and rejected as "untimely".

I could not file a BP-10 or BP-11 because of the reason they were rejected. So that is considered the end of the procedure for the first 10 remedies I filed. I have exhausted the remedy procedure on them.

The 10 were as follows:

1. Remedy # 485694-F1 Was regarding officer Ginister harass-me about my pants and the Warden ordering me uncuff them as stated exactly in the letter to the Warden that has been admitted into evidence. In it is details how the warden reacted to that matter. (Exhibit #3)
2. Remedy # 485689-F1 Discrimination regarding my transfer and refusing to inform me why I was transferred and staff bullying and harassing me. (Exhibit #4)
3. 485696-F1 Officer Caron ordering me to uncuff my pants and his attitude in that. (Exhibit #5)
4. 485698-F1 Officer Saenz ordering to lower my jogging

pants below the ankle, which no officer ever orders anyone to ever do! (Exhibit #6)

5. 485695-F1 Staff harassing me in the chow hall and harassing me regarding Islamic books. (Exhibit #7)

6. 485693-F1 Staff harassing me and retaliation and discrimination I go through from staff. (Exhibit #8)

7. 485692-F1 Incidents of staff harassing me and discriminating against me. (Exhibit #9)

8. 485691-F1 Officer telling other inmates that I'm bad news and a terrorist on my 1st days on the compound and to stay away from me. (Exhibit #10)

9. 485690-F1 Staff harassment and staff going around asking inmates about me. (Exhibit #11)

10. 485699-F1 Staff harassment on the compound. (Exhibit #12)

On all of these I filed BP-8's ^{that} I obtained from other inmates and when I was finally able to get BP-9's from inmates who got them from other units I filed them. But since I was only able to get the BP-9's after more than 20 days after the BP-8's were signed they rejected all these as untimely. I was therefore unable to finish the last two steps of exhausting the remedy procedure and by that this final rejection is considered the end of the grievance procedure for this situation since I'm not able to take them any further.

10) The allegations of the defendants that I have not exhausted the administrative remedies is now MOOT. The previous 10 remedies that were mentioned and exhausted mention directly the two issues that the Hon. Judge Brian Owsley retained in this case.

11) Ever since the new staff member took over representing our unit Mr. Peres I file grievances on a nearly weekly basis regarding discrimination and harassment of the staff as ordered and approved by defendants.

I have filed to date over 30 remedies some are in the initial BP-8 stage some are in the BP-9 stage, some are in the BP-10 stage and others are in the final BP-11 stage and I'm sure Mrs. Sweaney can testify to that.

12) Also, the fact they order me to purposely violate my religion on daily basis and harass me the way they do and more recently a staff member assaulted me is an irreparable harm and filing administrative remedies is futile and those are exceptions to exhausting the administrative remedy procedure. (Ferguson v. Ashcroft (2003, MD LA) 248 F supp 2d 547) Pimental v. Gonzalez (2005, ED NY) 367 F Supp 2d 365.

13) In Cruz v. Beto, 405 U.S. 319, 322 (1972) the court stated that a complaint should not be dismissed unless it appears that beyond doubt that the plaintiff can prove no set of facts in support of his claims which would entitle him to relief.

14) In Conely v. Gibson, 355 U.S. 41, 45-46 (1957) the supreme court said that in considering a motion to dismiss, a pro se complaint

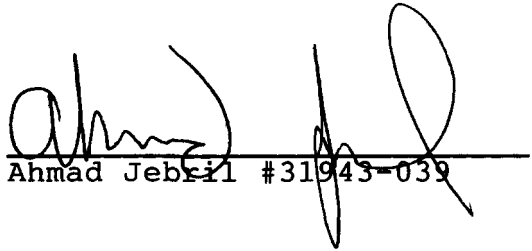
should be held to less strict standards than a motion drafted by a lawyer.

15) Having the case dismissed then me refiling the case the following day with the mentioned 10 remedies that I exhausted would only cause me undue hardship and make me pay another filing fee that I cannot afford.

16) I demonstrated that I sincerely attempted to file grievances even after filing the case when I did not have to. Staff cannot hold the key to filing the grievances not give the key then shed tears over not filing them.

I pray that the court look into each and every reason I mentioned as every reason alone is sufficient not to dismiss the case claiming I did not exhaust the remedies.

Respectfully submitted,




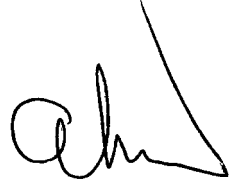
Ahmad Jebri #31943-039

Certificate of Service

I hereby certify that on 6/12/08, 2008 at 9:30am I handed the mail room officer the attached motion addressing one to the court with the proper 1st class stamps:

Clerk
U S district Court
Southern District of Texas
1133 N. Shoreline Room 208
Corpus Christi, TX 78401

And another to:
Jimmy Rodriguez
Assistant U S Attorney
Southern District of Texas
919 Milam Suite 1500
P O Box 61129
Houston, TX 77208



Ahmad Jebel 31943-039

STATE REQUEST TO STAFF MEMBER

U.S. DEPARTMENT OF JUSTICE
FEDERAL BUREAU OF PRISONS

id Title of Staff Member) Warden Dan Joshi	DATE: Sept. 10, 07
Jebril	REGISTER NO.: 31943-039
GNMENT:	UNIT: 40A

Exhibit

(Briefly state your question or concern and the solution you are requesting. Continue on back, if necessary, to be specific may result in no action being taken. If necessary, you will be interviewed in order to successfully your request.)

Staff have been harassing me in getting
grievance forms Please give me some

BP-8 and 9's thank you.

(Do not write below this line)

MON:

Staff Member:

Date:

STATE REQUEST TO STAFF MEMBER

U.S. DEPARTMENT OF JUSTICE
FEDERAL BUREAU OF PRISONSName and Title of Staff Member
Warden Joslin

DATE:

Aug. 20, 2007

REGISTER NO.:

31943-039

AGNMENT:

UNIT:

LOA

(Briefly state your question or concern and the solution you are requesting. Continue on back, if necessary. To be specific may result in no action being taken. If necessary, you will be interviewed in order to successfully your request.)

Staff have been giving me a hard time getting the administrative remedy forms.
I need copies of the BP-18 so I can file on some issues.

(Do not write below this line)

TION:

Staff Member:

Date:

REJECTION NOTICE - ADMINISTRATIVE REMEDY

DATE: MARCH 12, 2008

FROM: ADMINISTRATIVE REMEDY COORDINATOR
THREE RIVERS FCI

TO : AHMAD MUSA JEBRIL, 31943-039
THREE RIVERS FCI UNT: LIVE OAK QTR: L01-121U
P.O. BOX 4000
THREE RIVERS, TX 78071

FOR THE REASONS LISTED BELOW, THIS ADMINISTRATIVE REMEDY REQUEST
IS BEING REJECTED AND RETURNED TO YOU. YOU SHOULD INCLUDE A COPY
OF THIS NOTICE WITH ANY FUTURE CORRESPONDENCE REGARDING THE REJECTION.

REMEDY ID : 485694-F1 ADMINISTRATIVE REMEDY REQUEST
DATE RECEIVED : MARCH 12, 2008
SUBJECT 1 : OTHER COMPLAINT AGAINST STAFF
SUBJECT 2 :
INCIDENT RPT NO:

REJECT REASON 1: YOUR APPEAL IS UNTIMELY. REGIONAL APPEALS (BP-10)
MUST BE RECEIVED WITHIN 20 DAYS OF THE WARDEN/CCM
RESPONSE OR RECEIPT OF THE DHO REPORT. THIS TIME
INCLUDES MAIL TIME.

Exhibit #3

Type or use ball-point pen. If attachments are needed, submit four copies. Additional instructions on reverse.

From: Jebril, Ahmad 31943-039 LOA Three Rivers
LAST NAME, FIRST, MIDDLE INITIAL REG. NO. UNIT INSTITUTION

Part A- INMATE REQUEST

On Thurs. 8/30/07 around 12:00pm I walked in the chow hall and a staff wearing blue trousers and a dress-up shirt who weeks later I seen with a name tag stating camp administrator - M. Ginster followed me through the chow line until I sat down. Then he leaned back on the wall listening to the conversation I sat with three other black inmates none who I knew. One who I can identify if I see again said brother why is that man starring you down since you walked in, following and listening?

I said I don't know.

I said who is he?

He said don't worry he's a nobody.

When I finished and walked out he said (HEY why is your pants cuffed up?)

I replied (For religious reasons I can't wear pants under my ankles)

He replied rudly (I don't believe you)

I said(I don't care what you believe)

He said (I'll check with the chaplain)

He was not wearing a name tag at that time. I seen the name tag weeks later when he came to our unit to read a shut off notice on water.

2/22/08
DATE

[Signature]
SIGNATURE OF REQUESTER

Part B- RESPONSE



DATE

WARDEN OR REGIONAL DIRECTOR

If dissatisfied with this response, you may appeal to the Regional Director. Your appeal must be received in the Regional Office within 20 calendar days of the date of this response.

ORIGINAL: RETURN TO INMATE

CASE NUMBER: 485294-F1

CASE NUMBER: _____

Part C- RECEIPT

Return to: _____
LAST NAME, FIRST, MIDDLE INITIAL REG. NO. UNIT INSTITUTION

SUBJECT: _____

DATE

RECIPIENT'S SIGNATURE (STAFF MEMBER)

When I attempted to observe his name tag that day I noticed 3 inmates 1 black and 2 Mexicans walk with cuffed up pants as he stood there not telling one of them a single word. If he did not notice them as he claimed before the warden the following day why did he notice me?

The following day on 8/31/07 I decided to tell the warden this matter and other matters I've been going through. As I began to speak to the Warden it seemed like he (Ginster) popped up from no where rudely interrupting our conversation not allowing me to finish talking to the warden with a sheet of paper in his hand saying it's policy that inmates wear pants below the ankles.

I asked if he talked to the Chaplain, he said yes and that's where he got the paper from.

On Oct. 15, 2007 during a conversation with Chaplain Noble regarding these matters I asked if someone ever came to about me cuffing up my pants and she denied anyone ever asked her.

During my chat with the Warden, and Ginster. The warden got hostile and ordered me to uncuff my pants!

I asked very gently and kindly to talk to him to hear me out he said he will NOT talk to me unless I uncuff my pants!

I informed the warden it was against my religion to wear anything below my ankles!

He again ordered me to sit and uncuff them.

He made me violate my religion.

There may be a policy not to wear anything above the ankles but there is always exceptions for religious requirements.

A hat is not allowed on the compound yet a Muslim Kufi is, even though due to the ignorance of the BOP a Kufi is not a requirement in Islam, rather it's more traditional style than a requirement. Similarly, there are special meals for religious requirements and likewise there is a special exception to allow Muslims who follow their religion wear pants above the ankles.

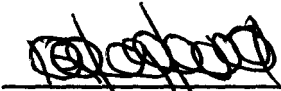
I asked the warden to allow me to have laundry shorten them, or to fold the inwards not showing but he was determined to make me violate my religion. As we were speaking other inmates passed us with cuffed up pants above the ankle but of course neither the Warden nor Ginster who again interrupted my talk with the warden outside the chow hall, and I asked him to give me a minute with the warden.

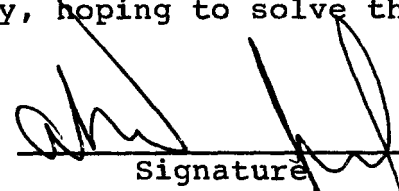
I later found in the library a essential Islamic reference stating my point of view. Enclosed is p. 397 of Sahih Muslim stamped Three Rivers Chapel property - Vol. IIIB), I can provide much more references from the outside as well.

I ask this and similar tactics of targetting me, harrassing me and discriminating against me stop. I ask that because of this and similar situations and my unjustified transfer that I be sent to a camp prison in my region and that the Three Rivers staff not retaliate against me by making my life any more miserable for exercising my right to file this complaint.

That day 8/31/07 was the last day I stepped foot in Three Rivers chow hall to avoid being targetted by the Three Rivers staff and minimize my exposure to them.

I spoke to the Warden as stated regarding this and other matters on 8/31/07 and wrote him a lengthy letter that same day, hoping to solve this matter and other matters but nothing changed much.


Date 2/22/08


Signature

NUMBER: TRV-1330.13 (n)
 DATE: March 28, 2006
 SUBJECT: ADMINISTRATIVE REMEDY
 PROCEDURES FOR INMATES

ATTACHMENT A

INFORMAL RESOLUTION - ADMINISTRATIVE REMEDY (BP-8)

TO: Miller- Kelley (Unit Counselor)
Mr. Brown (Unit)

1. Briefly state your complaint. Include all details and facts which support your request and the date on which the complaint occurred.

On 8/30/07 at 12pm in the chow hall M. Ginster was following me and then on my way out began to harass me about wearing my pants at the ankles after I told him it was for religious reasons.

2. What action are you requesting to resolve your complaint?
 That Ginster be reprimanded and fired for harassing me about religious matters and that I not be harassed about this matter because I do it for religious reasons.

If you are soooooo worried about gang awareness go stop their meetings and harass the real gangsters. I dont belong to any group or gang. But you hate Islam!

3. What have you done and who have you spoken to regarding your complaint?
 Spoke to the Joslin who only made things worse.

Inmate Name Ahmad Jebrül Register No.: 31943-039
 Unit LOA

RETURN THE COMPLETED FORM TO YOUR COUNSELOR

DO NOT WRITE BELOW THIS LINE

4. RESPONSE BY STAFF MEMBER Date Received From Inmate 2/15/08
Mr Ginster no longer works for FCI TRV
request denied

Responding Staff Member Name/Title _____ Date _____
 Unit Manager Signature And Kelley Date Reviewed 2-15-08
 Date Returned to Inmate _____

Administrative Remedy (BP-9) Requested or Issued: Yes _____ No _____

M-15

SATIRAH MUSLIMAH

BEING TRADITIONS OF THE SAYINGS AND
DOINGS OF THE PROPHET MUHAMMAD
AS NARRATED BY HIS COMPANIONS
AND COMPILED UNDER THE TITLE
AL-JAM'US-SAGHIR

BY IMAM MUSLIM

RENDERED INTO ENGLISH BY
ABDUL HAKIM SIDDIQI

WITH EXPLANATORY NOTES
AND BRIEF BIOGRAPHICAL
SKETCHES OF MAJOR NARRATORS

CORRECTED AND REVISED BY
DR. HASSAN

VOLUME B

SH. MUHAMMAD ASKRAF
BOOKSELLERS
& IMPORTERS

"PROPERTY OF U.S.A."
THREE RIVERS CHAPL

[٨٢٠٨٥] وحده

مُتَقَارِبَةً. قَالُوا: حَدَّثَنَا ر

خُفْرٌ يَقُولُ: أَمَرْتُ مُسْلِمَ

خَالِسَ بَيْنَهُمَا: أَسَمِعْتُ،

يَقُولُ: لَا يَنْظُرُ اللَّهُ إِلَيْهِ يَ

[٢٠٨٦] ح

عَنْ اللَّهِ بْنِ وَاقِدٍ، عَنْ ا

فَقَالَ: يَا عَبْدَ اللَّهِ! ارْفَعْ

بَعْضَ الْقَوْمِ إِلَى أَيْنَ؟ فَدَ

[٢٠٨٧] حَد

زِيَادٍ) قَالَ: سَمِعْتُ أَبَاهُ رَ

عَلَى الْبَحْرَيْنِ، وَهُوَ يَقُولُ

إِلَى مَنْ يَجْرُ إِزَارَةُ نَظَرًا،

[١٢٠٨٧] حَدَّثَنَا مُحَمَّدٌ

حَدَّثَنَا ابْنُ أَبِي عَدِيٍّ. كَلَا

بَسْخَلِفَ أَبَا هُرَيْرَةَ. وَفِي

- ١٠

[٢٠٨٨] ح

سَلِيمٍ) عَنْ مُحَمَّدِ بْنِ ز

أَعَجَبَتْهُ جَمَّتُهُ وَبُرْدَاهُ، إِذْ

[١٢٠٨٨] وَحَدَّثَنَا عُبَيْدُ

خُفْرٌ. ح وَحَدَّثَنَا مُحَمَّدٌ

مُحَمَّدُ بْنُ زِيَادٍ، عَنْ أَبِي

[٢٠٨٨] حَدَّثَنَا

الْأَعْرَجُ، عَنْ أَبِي هُرَيْرَةَ

أَعَجَبَتْهُ نَفْسُهُ، فَخَسَفَ ا

[2085R8] Muhammad b. 'Abbād b. Ja'far reported: I ordered Muslim b. Yasār, the freed slave of Nāfi' b. 'abd Al-Hārith, while I was sitting between them, that he should ask Ibn 'Umar if he had heard anything from Allah's Messenger (may peace be upon him) pertaining to one who trails his lower garment out of pride. He said: I heard him (the Holy Prophet) saying: Allah will not look toward him on the Day of Resurrection.

[2086] Ibn 'Umar reported: I happened to pass before Allah's Messenger (may peace be upon him) with my lower garment trailing (upon the ground). He said: 'Abdullah, tug up your lower garment. I tugged it up, and he again said: Tug it still further, and I tugged it still further and I went on tugging it afterward, whereupon some of the people said: To what extent? Thereupon he said: To the middle of the shanks.

[2087] Abū Huraira reported that he saw a person whose lower garment had been trailing and he was striking the ground with his foot. He was the Amīr of Bahrain. It was said: Here comes the Amīr, here comes the Amīr. He (Abū Huraira) reported that Allah's Messenger (may peace be upon him) said: Allah will not look toward him who trails his lower garment out of pride⁽¹⁾.

[2087R1] This hadīth has been reported on the authority of Shu'ba with the same chain of transmitters and in the hadīth transmitted on the authority of Ibn Ja'far (the words are): Marwān had made Abū Hurara as his deputy, and in the hadīth transmitted on the authority of Ibn Muthannā (the words are): Abū Huraira was the Governor of Madina.

Chapter 10

IT IS FORBIDDEN TO WALK WITH PRIDE, OVER-PLEASED WITH FINE CLOTHES

[2088] Abū Huraira reported that Allah's Messenger (may peace be upon him) said that there was a person who used to walk with pride because of his thick hair and fine mantles. He was made to sink in the earth and he would go on sinking in the earth until the Last Hour would come.

[2088R1] This hadīth has been narrated on the authority of Abū Huraira but with a different chain of transmitters.

[2088R2] Abū Huraira reported that Allah's Messenger (may peace be upon him) had said: There was a person who walked with pride because of his (fine) mantles and well pleased with his personality. Allah made him sink in the earth and he would go on sinking in that until the Day of Resurrection⁽²⁾.

(1) In case of men, the lower garment should not fall lower than the ankles. If it is kept just above the ankles, it is permissible. Women are allowed to let their lower garments fall below the ankles.

(2) A deep irony is couched in the words of this hadīth. The vain person was in the habit of walking proudly on the surface of the earth with his head stuffed with conceit. This is the

REJECTION NOTICE - ADMINISTRATIVE REMEDY

DATE: MARCH 12, 2008

FROM: ADMINISTRATIVE REMEDY COORDINATOR
THREE RIVERS FCI

TO : AHMAD MUSA JEBRIL, 31943-039
THREE RIVERS FCI UNT: LIVE OAK QTR: L01-121U
P.O. BOX 4000
THREE RIVERS, TX 78071

FOR THE REASONS LISTED BELOW, THIS ADMINISTRATIVE REMEDY REQUEST
IS BEING REJECTED AND RETURNED TO YOU. YOU SHOULD INCLUDE A COPY
OF THIS NOTICE WITH ANY FUTURE CORRESPONDENCE REGARDING THE REJECTION.

REMEDY ID : 485689-F1 ADMINISTRATIVE REMEDY REQUEST
DATE RECEIVED : MARCH 12, 2008
SUBJECT 1 : OTHER COMPLAINT AGAINST STAFF
SUBJECT 2 :
INCIDENT RPT NO:

REJECT REASON 1: YOUR APPEAL IS UNTIMELY. REGIONAL APPEALS (BP-10)
MUST BE RECEIVED WITHIN 20 DAYS OF THE WARDEN/CCM
RESPONSE OR RECEIPT OF THE DHO REPORT. THIS TIME
INCLUDES MAIL TIME.

Exhibit #4

Type or use ball-point pen. If attachments are needed, submit four copies. Additional instructions on reverse.

From: Jebril, Ahmad 31943-039 LOA Three Rivers-FC
LAST NAME, FIRST, MIDDLE INITIAL REG. NO. UNIT INSTITUTION

Part A- INMATE REQUEST

On 9-13-07 I had team with only case manager R. Barrera present. He informed directly and straight up that he will keep me in this institution for three years. This relates to my request to be transferred and discrimination in this institution against me. When I asked the case manager for more details he directed me to hire an attorney. My family have been in contact with an attorney(s) and it's my right to have the following which I requested verbally from Barrera and finally in a cop-out on (10-2-07) with a copy enclosed. When I requested the information in a cop-out it was based on R. Barrera's request when I asked him verbally right after our team meeting. I need the following: (He has not responded)

1) I would like to go through my file and see every document relating to my transfer from Milan low to Three Rivers medium outside my region while I have only 4 custody level points. I would like to go through the file and obtain copies and cost of copies may be taken out of my commissary account. 2) I need a copy of a memo that went out to Three Rivers staff about me warning of me prior to my arrival which caused the majority of Three Rivers staff with the exception of a few to treat me in a discriminatory, bullying, harassing and prejudiced manner, that along with what is on staff warning boards about me. If you treated me justly there is nothing to fear in presenting me with those documents.

2/22/08
SIGNATURE OF REQUESTER

Part B- RESPONSE

DATE

WARDEN OR REGIONAL DIRECTOR

If dissatisfied with this response, you may appeal to the Regional Director. Your appeal must be received in the Regional Office within 20 calendar days of the date of this response.

ORIGINAL: RETURN TO INMATE

CASE NUMBER: 425689-F1

CASE NUMBER: _____

Part C- RECEIPT

Return to: _____
LAST NAME, FIRST, MIDDLE INITIAL REG. NO. UNIT INSTITUTION

SUBJECT: _____


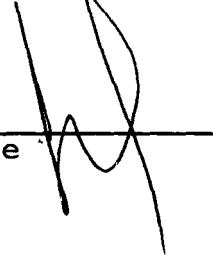
DATE

RECIPIENT'S SIGNATURE (STAFF MEMBER)

My mother is very ill as stated in my PSI which was compiled over three years ago and her condition is now worse. I have been dealing with discriminatory bullying staff not to mention heartless who insist on keeping 35 hours away from my region in a much higher security prison than my true custody yet they can't even inform me why I'm being treated like this I will fight through all LEGAL remedies for my right to be somewhere close to where my precious mother can visit in a prison of my true custody level.

I ask that I not be retaliated against for exercising my right to file this complaint.


Date 2/22/08


Signature 

NUMBER: TRV-1330.13 (h)
 DATE: March 28, 2006
 SUBJECT: ADMINISTRATIVE REMEDY
 PROCEDURES FOR INMATES

ATTACHMENT A

INFORMAL RESOLUTION - ADMINISTRATIVE REMEDY (BP-8)

TO: Miller-Kelley (Unit Counselor)Mr. Brown (Unit)

1. Briefly state your complaint. Include all details and facts which support your request and the date on which the complaint occurred.

On 9-13-07 in team. Barrera said I will be in this prison for 3 years. This prison is above my security level and outside my region. Its unjust to place me this far and this level of inmates who are not of my level.

2. What action are you requesting to resolve your complaint?
 ① That I be sent to a camp in my region because the management variable is unjust.

② That even though Milan sparked this variable that Three Rivers resolve this matter and not be submissive to what was done in Milan (UNJUST).

③ That THE MEMO THAT WAS SENT TO STAFF ABOUT ME PRIOR TO MY ARRIVAL TO ME.

3. What have you done and who have you spoken to regarding your complaint?

Spoke to Barrera, Kelley, Noble, and others. All give the run-around.

Inmate Name Ahmad Jèbril Register No.: 31943-039

Unit LOA

RETURN THE COMPLETED FORM TO YOUR COUNSELOR

DO NOT WRITE BELOW THIS LINE

4. RESPONSE BY STAFF MEMBER

Date Received From Inmate 2-15-08

No such memo exist - therefore it cannot be submitted.
 DSCC Staff designate and place management variable on not just staff sign will be re-evaluated in a transfer in accordance of policy. If it recommends a transfer it will be submitted.

Responding Staff Member Name/Title

Date

Unit Manager Signature

Amel Kelley

Date Reviewed

2-15-08

Date Returned to Inmate

Administrative Remedy (BP-9) Requested or Issued: Yes

No

U.S. DEPARTMENT OF JUSTICE

FEDERAL BUREAU OF PRISONS

TO: (Name and Title of Staff Member) R. Barrera (LOA Case manager)	DATE: 10-2-07
FROM: Ahmad Jebail	REGISTER NO.: 31943-039
WORK ASSIGNMENT: orderly	UNIT: LOA

SUBJECT: (Briefly state your question or concern and the solution you are requesting. Continue on back, if necessary. Your failure to be specific may result in no action being taken. If necessary, you will be interviewed in order to successfully respond to your request.)

In our last team you indicated I will be in this institution for 3 y
My transfer along with your persistence on me staying here is discriminator
I plan to legally fight for my rights every day of my 3 year stay here
Especially that my mother is very ill and you have deprived me from
ever seeing her. I therefore need: ① Copies of every single document
relating to my transfer* such as affidavits, reports, statements, reasons, etc.
all but not limited to what I mentioned. Cost of copies may be taken from my account
 ② I would like to set up a time to go through my entire file and take
my time doing it ③ I need a copy of the memo that was sent to the
entire 3-Rivers staff about me prior to my arrival
 ④ If any of this or all of this is denied I appreciate it in writing
*I need all what justifies putting a 4 custody level pointer in a high medium outside
his (jurisdiction) (35 hours from home) (Do not write below this line)

DISPOSITION:

Signature Staff Member

Date

Record Copy - File; Copy - Inmate
 (This form may be replicated via WP)

This form replaces BP-148.070 dated Oct 86
 and BP-S148.070 APR 94

REJECTION NOTICE - ADMINISTRATIVE REMEDY

DATE: MARCH 12, 2008

for Signature - S. Krieger
FROM: ADMINISTRATIVE REMEDY COORDINATOR
THREE RIVERS FCI

TO : AHMAD MUSA JEBRIL, 31943-039
THREE RIVERS FCI UNT: LIVE OAK QTR: L01-121U
P.O. BOX 4000
THREE RIVERS, TX 78071

FOR THE REASONS LISTED BELOW, THIS ADMINISTRATIVE REMEDY REQUEST
IS BEING REJECTED AND RETURNED TO YOU. YOU SHOULD INCLUDE A COPY
OF THIS NOTICE WITH ANY FUTURE CORRESPONDENCE REGARDING THE REJECTION.

REMEDY ID : 485696-F1 ADMINISTRATIVE REMEDY REQUEST
DATE RECEIVED : MARCH 12, 2008
SUBJECT 1 : OTHER COMPLAINT AGAINST STAFF
SUBJECT 2 :
INCIDENT RPT NO:

REJECT REASON 1: YOUR APPEAL IS UNTIMELY. REGIONAL APPEALS (BP-10)
MUST BE RECEIVED WITHIN 20 DAYS OF THE WARDEN/CCM
RESPONSE OR RECEIPT OF THE DHO REPORT. THIS TIME
INCLUDES MAIL TIME.

Exhibit 5

Type or use ball-point pen. If attachments are needed, submit four copies. Additional instructions on reverse.

From: Jebril, Ahmad 31943-039 LOA Three Rivers-FC
LAST NAME, FIRST, MIDDLE INITIAL REG. NO. UNIT INSTITUTION

Part A- INMATE REQUEST RE: Harassment & Discrimination & Violation of Religious Rights BY officer Caro

On Oct. 30, 2007 approximately 10:41am I got my commissary and was headed to the mail room when a black officer who is overweight stopped me say HEY YOU COME HERE.

I approached him as he was standing with another white officer.

HE SAID: (Uncuff your pants now!)

I SAID: (I HAVE A RELIGIOUS EXCUSE)

HE SAID: (I Said uncuff your pants now)

I SAID: (OK LET me sit and uncuff them) because I was carrying legal folders and commissary.

HE SAID: (I said right now)

As I put my items down towards the shack where the metal detector is I began to uncuff them I looked upward to my other side and seen two other officers looking at me and at CARO and smiling in a mocking manner.

I then approached the tall overweight officer and said (CAN I please get your name?)

HE SAID: (CARO) (and spelled it out)

2/22/08
DATE

[Signature]
SIGNATURE OF REQUESTER

Part B- RESPONSE



DATE

WARDEN OR REGIONAL DIRECTOR

If dissatisfied with this response, you may appeal to the Regional Director. Your appeal must be received in the Regional Office within 20 calendar days of the date of this response.

ORIGINAL: RETURN TO INMATE

CASE NUMBER: 485616-FI

CASE NUMBER: _____

Part C- RECEIPT

Return to: _____
LAST NAME, FIRST, MIDDLE INITIAL REG. NO. UNIT INSTITUTION

SUBJECT: _____

DATE

RECIPIENT'S SIGNATURE (STAFF MEMBER)

I left the shack area and decided to return to my unit rather than go on to the mail room.

I looked back as I was getting to the unit they were all looking at me and smiling in a mocking manner.

The officer who was originally standing with CA/IO was the only one out of the four officers who did not mock or show reaction.

On Aug, 27, 07 I spoke to the Captain of Three Wivers regarding matters like this and similar situations.

On Aug. 31, 07 I spoke to the Warden of Three Wivers regarding situations identical to this and wrote him a lengthy letter detailing this kind of harassment, discrimination, bullying and mocking!

I even enclosed a copy of references in the Chapel that specify a Muslim must wear his pants above his ankles.

Evidently speaking to the Captain and warden only made things worse.

I have not stepped foot in the chow hall since Aug, 31, 07 because of matters like this.


I gave the warden and captain time to correct the harassment I face on this discriminatory compound but again things are only getting worse.

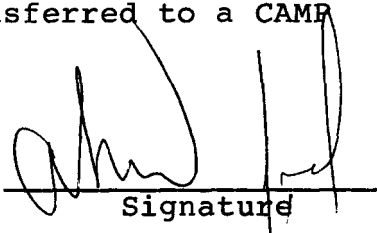
When I decided to avoid the haters in the chow hall and stay away from them picking on me, now it's escalated and moved to the shack/metal detector area where they harass me on continuous basis as in this particular incident.

I'm asking this type of treatment stop because it's getting out of hand, not only did CA/IO order me to violate my religion, but he did so in an unprofessional hostile manner as his freinds looked in a mockingly manner. In addition to that I'm targetted for this kind of treatment. Plenty of inmates walk around with cuffed up pants but CA/IO and his likes only see me because they get satisfaction and happiness in targetting me in particular to get me to violate my religion.

This is the result of discrimination and possibly a memo that went out prior to my arrival on this compound warning of me.

I ask that this and similar matters be dealt with and if the retaliation on me filing this is to transfer me to avoid responding to this or having it reach General Counsel then I should be transferred to a CAMP according to my level and in my region.


DATE 2/22/08


Signature

NUMBER: TRV-1330.13 (h)
 DATE: March 28, 2006
 SUBJECT: ADMINISTRATIVE REMEDY
 PROCEDURES FOR INMATES

ATTACHMENT A

INFORMAL RESOLUTION - ADMINISTRATIVE REMEDY (BP-3)

TO: Mr. Brown (Unit Counselor)
 A. Miller-Kelley (Unit)

1. Briefly state your complaint. Include all details and facts which support your request and the date on which the complaint occurred.

Ever since I got to this establishment I've been bullied, discriminated, harass and targetted. Last occurrence on Oct 30, 07 @ 11:30am ^{CO SCIENCE} bullied me and harassed me telling me I should not look at him and ordered me to lower my JOGGING pants below my ankle b/c he knows that violates my religion (note JOGGING PANTS NOT KAKIS). This was officer SCIENCE alone. AT 10:41am that day CARO harassed me in a similar manner as Science looked on smiling! I was wearing Kakis then On 10/4/07 at about 5:30pm.

2. What action are you requesting to resolve your complaint? (continued on next page)

I request that this harassment, bullying, targetting, and discrimination by the great vast majority of this discriminatory staff STOP. LEAVE ME ALONE!! I have never stepped foot in the chow hall since 8/31/07 AT ALL because the staff ran me off. Now they moved their filthy tactics to the metal detector shack and other areas!! LEAVE ME ALONE! TREAT ME LIKE you treat normal inmates. AND send me to a camp in my region where I belong.

3. What have you done and who have you spoken to regarding your complaint?

On Aug. 27, 07 I spoke to Captain Higginson regarding many issues like these here and similar ones. On 8/31/07 I spoke to Warden Joslin and wrote him a long letter regarding these similar issues. On 9/11/07 I spoke to A. Miller-Kelley briefly regarding an incident with the CO working that time she said (I don't think so) when I told her he discriminates against me and what he did. I also spoke to ~~other staff~~ for help. AHMAD JEBRIL 31943-039

Inmate Name _____
 other Staff _____

Register No.: _____

Unit LOA

RETURN THE COMPLETED FORM TO YOUR COUNSELOR

DO NOT WRITE BELOW THIS LINE

4. RESPONSE BY STAFF MEMBER Date Received From Inmate

All ~~parts~~ ^{women} @ the institution must ~~down~~ ^{on your} legs - not tucked under when ~~it~~ ^{it creates some} awareness. Staff have been informed to enforce this practice.

Responding Staff Member Name/Title _____

Date 11/27/07

Unit Manager Signature _____

1/28

Kelly

Date Reviewed 11/27/07

Date Returned to Inmate _____

Administrative Remedy (BP-9) Requested or Issued: Yes _____ No _____

(Continue answer to question #1)

I was carrying Islamic books I was returning to the chapel when ^{another} ~~the~~ CO there questioned me if I had a class, starred me down in disrespect then after that let me go.

I did not dare look at him because other officers like Science told me not to look at them.

This officer is one of the officers who ran me out of the chow hall when I used to go there he used to stare me down as he still does and search no matter how many times a day.

Now he chased me out to other areas after I left him the chow hall.

He is the same officer who made a big deal on 8/26/07 @ 6pm when he found me leaving the chow hall and searched me and found internet papers Whenever he is working he stares me down and always with ~~exceptional~~ ~~excep-~~ ~~tions~~ searches and harasses me.

I left him the chow hall leave me alone to walk in peace through the metal detector like any other inmate(s) and the tens who passed us up carrying Bibles going to church services. He did not harass any of them! Similarly on 10/27/07 @ 3:15p. (Smith) whispered to a female CO to pull me for a so-called random alcohol test from a very large crowd. I do not get checked random, it's random I don't get checked.

These are just mere samples of what goes on here to me and there is plenty more. This serves as an "informal resolution" for these specified incidents and all similar ones.

*If you plan on taking me to the HOLE for exercising my right to this complain I ask you make sure to pack all my stuff or allow me to pack it; I just filed a \$1055 tort claim on your brothers in Milan FCI for property they lost or destroyed and I really don't want to file one on here. ^{or allow let me pack them (if) at any time I write this stuff up you decide to put me in the SHU}

*I know your all aware that my custody level is camp in my region so if you are going to transfer me it should be to a camp in my region. Not that staff like this will but I just wanted it written here for further legal matters., in case you decide to transfer me to a.c.d. responding to my complaints.

REJECTION NOTICE - ADMINISTRATIVE REMEDY

DATE: MARCH 12, 2008

f *Signed: J. P. Friedman*
FROM: ADMINISTRATIVE REMEDY COORDINATOR
THREE RIVERS FCI

TO : AHMAD MUSA JEBRIL, 31943-039
THREE RIVERS FCI UNT: LIVE OAK QTR: L01-121U
P.O. BOX 4000
THREE RIVERS, TX 78071

FOR THE REASONS LISTED BELOW, THIS ADMINISTRATIVE REMEDY REQUEST
IS BEING REJECTED AND RETURNED TO YOU. YOU SHOULD INCLUDE A COPY
OF THIS NOTICE WITH ANY FUTURE CORRESPONDENCE REGARDING THE REJECTION.

REMEDY ID : 485698-F1 ADMINISTRATIVE REMEDY REQUEST
DATE RECEIVED : MARCH 12, 2008
SUBJECT 1 : OTHER COMPLAINT AGAINST STAFF
SUBJECT 2 :
INCIDENT RPT NO:

REJECT REASON 1: YOUR APPEAL IS UNTIMELY. REGIONAL APPEALS (BP-10)
MUST BE RECEIVED WITHIN 20 DAYS OF THE WARDEN/CCM
RESPONSE OR RECEIPT OF THE DHO REPORT. THIS TIME
INCLUDES MAIL TIME.

Exhibit #6

Type or use ball-point pen. If attachments are needed, submit four copies. Additional instructions on reverse.

From: Jebril, Ahmad 31943-039 LOA Three Rivers
LAST NAME, FIRST, MIDDLE INITIAL REG. NO. UNIT INSTITUTION

Part A- INMATE REQUEST RE: Harassment, Discrimination, mocking, and violation of religious rights by Officer Science.

On Oct. 30, 2007 approximately 11:30am I dressed in my gray jogging suit and had my work-out gloves with me as I do every single day to work-out. When I got to the shack/metal detector area the officer had been staring at me all along so I looked casually at him and kept walking. After passing him a few meters he said: (hey, come here) I went to him and kept some distance.

He got close to me, ~~he said: (hey, come here) I went to him and kept some distance.~~ I DID NOT SAY A WORD!

He said: (YOU WERE LOOKING AT ME SO YOU MUST BE HAVE OR BE DOING SOMETHING ILLEGAL I said: (What?))

He said: (What do you have with you) as he began to look at me from top to bottom!

He Said: (Let me see those gloves.. do you have a receipt? Where did you buy them? How did you get them?)

As he was doing this he was looking at the gloves at each finger of them

2/22/08
DATE

[Signature]
SIGNATURE OF REQUESTER

Part B- RESPONSE

DATE

WARDEN OR REGIONAL DIRECTOR

If dissatisfied with this response, you may appeal to the Regional Director. Your appeal must be received in the Regional Office within 20 calendar days of the date of this response.

ORIGINAL: RETURN TO INMATE

CASE NUMBER: 485698-F1

CASE NUMBER: _____

Part C- RECEIPT

Return to: _____
LAST NAME, FIRST, MIDDLE INITIAL REG. NO. UNIT INSTITUTION

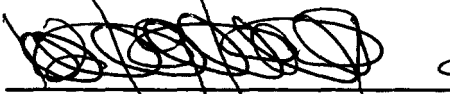
SUBJECT: _____

DATE

RECIPIENT'S SIGNATURE (STAFF MEMBER)

OPEN

as though something could be hidden in the fingers of the gloves.
 I SAID:(I got them from Milan FCI and yes I got the REciept officer and I also got the property inventory slip that I left with them from Milan and another property slip that I got when I came here).
 He gave them back to me.
 Then he kept starring me from head to toe then he said:(PULL DOWN YOUR PANTS)
 He meant to lower my pants down.
 I said: (why?)
 He said: (DO IT |WIGHT NOW)!
 I Said: (But why why?)
 He said:(right now)
 So I lowered my gray sweat pants to my ankles. They have lastic bands that hold them where you want.
 When he told me to lower them I had them at my socks line or slightly above as I always do, since I never wear shorts.
 Then he seen them right above my ankles and said:(LOWER them more!!)
 I did so.
 Then he asked me to leave.
 I said:(Officer may I get your name?)
 He said:(Officer)
 I said:(Officer what?) He said :(officer!) I said(Officer What) He said:(officer Science), his name tag was in his pocket and now showing.
 WHE|E ON THIS COMPOUND DOES AN INMATE GET STOPPED AND O|DE|IED TO LOWE| HIS JOGGING PANTS TO BELOW HIS ANKLES BUT ME?
 This is solid proof that Science and his likes only want to taunt, bully and discriminate against me because they get joy to see me violate my religion and intimidate me.
 Notice his statements to me. I can't look at him and must be doing something wrong/.
 This is the type of treatment I get everyday on Three |ivers and it's what I spoke to the Captain and Warden about on 8/27/07 and 8/31/07 and wrote them about on 8/31/07. I even quit going to the chow hall as of 8/31/07 because of this vicious treatment hoping to avoid the likes of Science but now they stepped up harassment but moved it to the shack/metal detector area where I can't avoid. Speaking and writting to the Warden and Captain and giving them time to resolve this matter and its likes that I go through daily because of a memo that warned of me prior to my arrival and because many CO's say and tell other inmates that I'm a terrorist or Bin Ladin...etc
 I ask that Science and his likes stop this ASAP because this treatment is out of hand. ~~Do not stop this because I got faith in Allah but I rather take the blame over waking up in this type of situation.~~ Nearly an hour before this Science was mocking me when another Caro officer told me to uncuff my kakies.
 I ask that this and similar matters that I go through daily be dealt with and if the retaliation on me filing this be a transfer to avoid responding to this or having it reach General Council then I should be transferred to a CAMP according to my level and in my region.
 Note: that I noticed other staff at distances watching us seeing what Scinece was doing to me and amongst them is the records officer who uses a cane sometimes and he had someone along with him.
 On 10/31/07 Science was starring me down anywhere I would be in his eyesight.


 Date

2/22/08


 Signature

NUMBER: TRV-1330.13 (1)
 DATE: March 28, 2006
 SUBJECT: ADMINISTRATIVE REMEDY
 PROCEDURES FOR INMATES

ATTACHMENT A

INFORMAL RESOLUTION - ADMINISTRATIVE REMEDY (BP-8)

TO: Mr. Brown (Unit Counselor)
A. Miller-Kelley (Unit)

1. Briefly state your complaint. Include all details and facts which support your request and the date on which the complaint occurred.

Ever since I got to this establishment I've been bullied, discriminated and targetted. Last occurrence on Oct 30, 07 @ 11:30am ^{to science} bullied me at telling me I should not look at him and ordered me to lower my ^{to science} my ankle b/c he knows that violates my religion (note JOGGING PANTS) was officer SCIENCE alone. AT 10:41am that day CARO harassed me in a s as Science looked on smiling! I was wearing Kakis then. On 10/4/07 at 4:00 (continued on next page)

2. What action are you requesting to resolve your complaint?

I request that this harassment, bullying, targetting, and discrimination by the great vast majority of this discriminatory staff STOP. LEAVE ME ALONE!! I have never stepped foot in the chow hall since 8/31/07 AT ALL because the staff ran me off. Now they moved their filthy tactics to the metal detector shack and other areas!! LEAVE ME ALONE! TREAT ME LI you treat normal inmates. AND send me to a camp in my region where I bel

3. What have you done and who have you spoken to regarding your complaint?

On Aug. 27, 07 I spoke to Captain Higgerson regarding many issues here and similar ones. On 8/31/07 I spoke to warden Joslin and wrote letter regarding these similar issues. On 9/11/07 I spoke to A. (so) briefly regarding an incident with the CO working that time she so when I told her he discriminates against me and what he did. for help. AHMAD JEBRIL 31943-039

Inmate Name
 other Staff

Register No.:

Unit LOA

RETURN THE COMPLETED FORM TO YOUR COUNSELOR

DO NOT WRITE BELOW THIS LINE

4. RESPONSE BY STAFF MEMBER Date Received From Inmate

All parts were @ the institution must down on your lead - not tucked under when that it created awareness. Staff have been informed to inform practice.

Responding Staff Member Name/Title JK

Date 11/27/07

Unit Manager Signature 1/28 Kelly

Date Reviewed 11/27/07

Date Returned to Inmate

Administrative Remedy (BP-9) Requested or Issued: Yes

No

(Continue answer to question #1)

I was carrying Islamic books I was returning to the chapel when ^{another} the CO there questioned me if I had a class, starred me down in disrespect then after that let me go.

I did not dare look at him because other officers like Science told me not to look at them.

This officer is one of the officers who ran me out of the chow hall when I used to go there he used to stare me down as he still does and search no matter how many times a day.

Now he chased me out to other areas after I left him the chow hall.

He is the same officer who made a big deal on 8/26/07 @ 6pm when he found me leaving the chow hall and searched me and found internet paper. Whenever he is working he stares me down and always ~~with exceptional wrap~~ ~~around~~ searches and harasses me.

I left him the chow hall leave me alone to walk in peace through the metal detector like any other inmate(s) and the tens who passed us up carrying Bibles going to church services. He did not harass any of them! Similarly on 10/27/07 @ 3:15pm (Smith) whispered to a female CO to pull me for a so-called random alcohol test from a very large crowd.

I do not get checked random, it's random I don't get checked.

These are just mere samples of what goes on here to me and there is plenty more. This ^{serves} as an "informal resolution" for these specified incidents and all similar ones.

(If) you plan on taking me to the HOLE for exercising my right to this complain I ask you make sure to pack all my stuff or allow me to pack it; I just filed a \$1055 tort claim on your brothers in Milan FCI for property they lost or destroyed and I really don't want to file one on here. Or at least let me pack them (if) at any time I write up these stuff up you decide to put me in the SHU. ~~DO NOT SIGN~~

*I know your all aware that my custody level is camp in my region so if you are going to transfer me it should be to a camp in my region. Not that staff like this will but I just wanted it written here for further legal matters, in case you decide to transfer me to avoid responding to my complaints.

REJECTION NOTICE - ADMINISTRATIVE REMEDY

DATE: MARCH 12, 2008

for *Theresa S. Kuntz*
FROM: ADMINISTRATIVE REMEDY COORDINATOR
THREE RIVERS FCI

TO : AHMAD MUSA JEBRIL, 31943-039
THREE RIVERS FCI UNT: LIVE OAK QTR: L01-121U
P.O. BOX 4000
THREE RIVERS, TX 78071

Exhibit #7

FOR THE REASONS LISTED BELOW, THIS ADMINISTRATIVE REMEDY REQUEST
IS BEING REJECTED AND RETURNED TO YOU. YOU SHOULD INCLUDE A COPY
OF THIS NOTICE WITH ANY FUTURE CORRESPONDENCE REGARDING THE REJECTION.

REMEDY ID : 485695-F1 ADMINISTRATIVE REMEDY REQUEST
DATE RECEIVED : MARCH 12, 2008
SUBJECT 1 : OTHER COMPLAINT AGAINST STAFF
SUBJECT 2 :
INCIDENT RPT NO:

REJECT REASON 1: YOUR APPEAL IS UNTIMELY. REGIONAL APPEALS (BP-10)
MUST BE RECEIVED WITHIN 20 DAYS OF THE WARDEN/CCM
RESPONSE OR RECEIPT OF THE DHO REPORT. THIS TIME
INCLUDES MAIL TIME.

Type or use ball-point pen. If attachments are needed, submit four copies. Additional instructions on reverse.

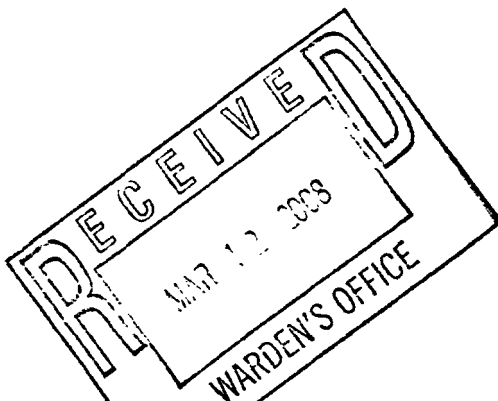
From: Jebril, Ahmad 31943-039 LOA Three Rivers -FC
LAST NAME, FIRST, MIDDLE INITIAL REG. NO. UNIT INSTITUTION

Part A- INMATE REQUEST

On 11/4/07 around 5:30pm an officer stopped me as usual at the shack metal/detector area. I was carrying Islamic Books I checked out from the library. He asked me if I was going to class or services. He stared me down as he ALWAYS does in humiliation and disrespectful manner. I let him know I was just returning these books to the chapel, then he stared me down more and let me go. THIS OFFICER ALWAYS STARES ME DOWN AND TARGETS ME. HE IS ONE OF THOSE WHO RAN ME OFF THE CHOW HALL WHEN I USED TO GO THERE BY HIS SEARCHES AND ACTIONS. ON 8/26/07 leaving the chow hall he searched me in a filthy way and found document I got off the internet from Ms. Noble and made them a big issue. HE THINKS HE CAN MAKE ME HOLD MY ARMS OUTRIGHT LIKE THEY DO IN ABU GHRAIB AND MUST GET SATISFACTION OUT OF IT. HE IS ALWAYS STARRING ME DOWN OR SEARCHING ME WHERE HE SEES ME. ON 11/04/07 SAME TIME I WAS RETURNING THE BOOKS MANY OTHERS WERE ON THEIR WAY TO BIBLE CLASS WITH BIBLES HE DID NOT STOP ANY OF THEM AND HARASS THEM. AT 5:30pm he was the only officer there and on my way back at 8pm I did not see him he may have been filling in I do not dare look at them to get their name tags but I know him and can identify him. HE AND HIS LIKES NEED TO LEAVE ME ALONE!

SIGNATURE OF REQUESTER

Part B- RESPONSE



DATE

WARDEN OR REGIONAL DIRECTOR

If dissatisfied with this response, you may appeal to the Regional Director. Your appeal must be received in the Regional Office within 20 calendar days of the date of this response.

ORIGINAL: RETURN TO INMATE

CASE NUMBER: 485695-F1

CASE NUMBER:

Part C- RECEIPT

Return to: LAST NAME, FIRST, MIDDLE INITIAL REG. NO. UNIT INSTITUTION

SUBJECT:

DATE



RECIPIENT'S SIGNATURE (STAFF MEMBER)

NUMBER: TRV-1330.13 (h)
 DATE: March 28, 2006
 SUBJECT: ADMINISTRATIVE REMEDY
 PROCEDURES FOR INMATES

ATTACHMENT A

INFORMAL RESOLUTION - ADMINISTRATIVE REMEDY (BP-9)

TO: Mr. Brown (Unit Counselor)
A. Miller-Kelley (Unit)

1. Briefly state your complaint. Include all details and facts which support your request and the date on which the complaint occurred.

Ever since I got to this establishment I've been bullied, discriminated, harassed and targeted. Last occurrence on Oct 30, 07 @ 11:30am ^{to science} bullied me and harassed me telling me I should not look at him and ordered me to lower my JOGGING pants below my ankle b/c he knows that violates my religion (note JOGGING PANTS NOT KAKIS). This was officer SCIENCE alone. AT 10:41am that day CARO harassed me in a similar manner as Science looked on smiling! I was wearing Kakis then. On 10/4/07 at about 5:30pm

2. What action are you requesting to resolve your complaint? (continued on next page)

I request that this harassment, bullying, targeting, and discrimination by the great vast majority of this discriminatory staff STOP. LEAVE ME ALONE!! I have never stepped foot in the chow hall since 8/31/07 AT ALL. because the staff ran me off. Now they moved their filthy tactics to the metal detector shack and other areas!! LEAVE ME ALONE! TREAT ME LIKE you treat normal inmates. AND send me to a camp in my region where I belong.

3. What have you done and who have you spoken to regarding your complaint?

On Aug. 27, 07 I spoke to Captain Higginson regarding many issues like these here and similar ones. On 8/31/07 I spoke to warden Joslin and wrote him a long letter regarding these similar issues. On 9/11/07 I spoke to A. Miller-Kelley briefly regarding an incident with the CO working that time she said (I don't think so) when I told her he discriminates against me and what he did. I also spoke to ~~other staff~~ for help. AHMAD JEBRIL 31943-039

Inmate Name LOA

Register No.: 31943-039

Unit LOA

RETURN THE COMPLETED FORM TO YOUR COUNSELOR

DO NOT WRITE BELOW THIS LINE

4. RESPONSE BY STAFF MEMBER Date Received From Inmate

All past work @ the institution must down on your
lead - not tucked under when that it creates some
awareness. Staff have been informed to enforce this
practice.

Responding Staff Member Name/Title JK

Date 4/27/08

Unit Manager Signature JK

Date Reviewed 11/27/07

Date Returned to Inmate _____

Administrative Remedy (BP-9) Requested or Issued: Yes _____

No _____

(Continue answer to question #1)

I was carrying Islamic books I was returning to the chapel when ^{another} the CO there questioned me if I had a class, starred me down in disrepect then after that let me go.

I did not dare look at him because other officers like Science told me not to look at them.

This officer is one of the officers who ran me out of the chow hall when I used to go there he used to stare me down as he still does and search no matter how many times a day.

Now he chased me out to other areas after I left him the chow hall.

He is the same officer who made a big deal on 8/26/07 @ 6pm when he found me leaving the chow hall and searched me and found internet papers. Whenever he is working he stares me down and always ~~with exceptional~~ searches and harasses me.

I left him the chow hall leave me alone to walk in peace through the metal detector like any other inmate(s) and the tens who passed us up carrying Bibles going to church services. He did not harass any of them. Similarly on 10/27/07 @ 3:15, Smith whispered to a female CO to pull me for a so-called random alcohol test from a very large crowd.

I do not get checked random, it's random I don't get checked.

These are just mere samples of what goes on here to me and ~~there~~ more. This ^{seems} is an "informal resolution" for these specified incidents and similar ones.

 *If you plan on taking me to the HOLE for exercising my right to this complain I ask you make sure to pack all my stuff or allow me to pack it; I just filed a \$1055 tort claim on your brothers in Milan FCI for property they lost or destroyed and I really don't want to file one on here. Or at least let me pack them (if) at any time I write up these stuff up you decide to put me in the SHU. ~~Don't mess with me~~

*I know your all aware that my custody level is camp in my region so if you are going to transfer me it should be to a camp in my region. Not that staff like this will but I just wanted it written here for further legal matters, in case you decide to transfer me to another responding to my complaints.

REJECTION NOTICE - ADMINISTRATIVE REMEDY

DATE: MARCH 12, 2008

for Lynett S. Krietzel
FROM: ADMINISTRATIVE REMEDY COORDINATOR
THREE RIVERS FCI

TO : AHMAD MUSA JEBRIL, 31943-039
THREE RIVERS FCI UNT: LIVE OAK QTR: L01-121U
P.O. BOX 4000
THREE RIVERS, TX 78071

Exhibit #8

FOR THE REASONS LISTED BELOW, THIS ADMINISTRATIVE REMEDY REQUEST
IS BEING REJECTED AND RETURNED TO YOU. YOU SHOULD INCLUDE A COPY
OF THIS NOTICE WITH ANY FUTURE CORRESPONDENCE REGARDING THE REJECTION.

REMEDY ID : 485693-F1 ADMINISTRATIVE REMEDY REQUEST
DATE RECEIVED : MARCH 12, 2008
SUBJECT 1 : OTHER COMPLAINT AGAINST STAFF
SUBJECT 2 :
INCIDENT RPT NO:

REJECT REASON 1: YOUR APPEAL IS UNTIMELY. REGIONAL APPEALS (BP-10)
MUST BE RECEIVED WITHIN 20 DAYS OF THE WARDEN/CCM
RESPONSE OR RECEIPT OF THE DHO REPORT. THIS TIME
INCLUDES MAIL TIME.

Type or use ball-point pen. If attachments are needed, submit four copies. Additional instructions on reverse.

From: Jebril, Ahmad 31943-039 LOA Three Rivers -
LAST NAME, FIRST, MIDDLE INITIAL REG. NO. UNIT INSTITUTION

Part A- INMATE REQUEST

Ever Since I arrived on Three Rivers compound Aug 13, 2007 I have been target ed by nearly the entire staff with the exception of some who treat me like a regular inmate! They harass me, bully me, target me and discriminate against me. On Aug. 27, 07 I spoke to Three Rivers captain to attempt to resolve this, whe nothing changed and matters were escalated the following days I spoke to the Warden on Aug. 31, 2007.

I also sent a lengthy detailed letter to the warden on Aug. 31, 2007. Matters got so bad that I have not entered nor stepped foot in the chow hall from Aug. 31, 2007 until today nor do I plan to.

I left the chow hall to the Warden, Captain and their discriminating staff to minimize my contact with them so they will leave me alone but apparently they don't understand.

For example I get searched more than any average inmate I seen or asked, and the manner they search me is disrespectful.

They target me for wearing cuffed up pants due to religious reasons yet others roam around freely with cuffed up pants but apparently they see who they want target.

Speaking to the Captain and warden, then writting them was an attempt to solve

alida/08 [Signature]
SIGNATURE OF REQUESTER

Part B- RESPONSE



DATE

WARDEN OR REGIONAL DIRECTOR

If dissatisfied with this response, you may appeal to the Regional Director. Your appeal must be received in the Regional Office within 20 calendar days of the date of this response.

ORIGINAL: RETURN TO INMATE

CASE NUMBER: 485693-F1

CASE NUMBER: _____

Part C- RECEIPT

Return to: _____
LAST NAME, FIRST, MIDDLE INITIAL REG. NO. UNIT INSTITUTION

SUBJECT: _____

DATE

RECIPIENT'S SIGNATURE (STAFF MEMBER)

this matter but now that I don't go to the chow hall they target me at the check point by the metal detector for alcohol tests for an example.

I got stopped at the alcohol test on 10/27/07 I was with a large gathering in the center and after I passed the fence and walked on for a while the female CO called me by my name for an alcohol test. I was informed that an official near her who I asked for his name named (SMITH) had told her to get me. I told her why when I always get stopped?

After taking the test I told Smith what's your name? Then I said (you guys accuse me of being a radical or terrorist yet always stop me here?)

(I'm a moderate Muslim who doesn't drink never did but if a moderate does not drink will one you accuse tbe a radical drink?)

When I met with the phych. I asked him to allow me to enter the drug program to get a year off he said no I don't fit the profile!!

YET!! STAFF HERE TELL INMATES AND ACCUSE ME OF BEING A RADICAL BAD NEWS terrorist yet I get stopped to take the alcohol test more frequently than any other inmate. Prior to that I was stopped on Oct. 8 or 10 of 2007 in Ramadan when I was heading to the chapel to pray while I was fasting! I was stopped many more times sometimes I explain that I get stopped so much the smart alics tell me well let see if you pass we just won't log it! Much of this occurred after I spoke to the warden and captain and wrote them!

On 8/27/07 I asked UNIT CO Summerfield to give me an army bag to take to the SHU & D to get my property as they informed us in A&O he I'll give you one to pack your stuff to the SHU.

That same day I asked him for toilet paper he refused to give me yet other inmates got some from him.

That same CO used to stare me down as most do and search me to the point that on 9/11/07 he called me over to search a pair of workout gloves in my hand looking in each finger to see it. Then he said I notice you wear a wrap sometimes and other times you don't go get me that wrap now. I said I need it the PA and doc. told me to wear it sometimes, he got baligerant and said are you refusing a direct order? I said no. I went and got them and told him I'll write him up. After an hour he came back and said I called medical and your lucky I'm a nice guy and you can get them but you need to carry a slip to let you wear this! WHO CARRIES A SLIP FOR A medical wrap? that thing don't even exist.

On 9/30/07 around 10pm all inmates leaving Ramadan prayer from chapel got searched which is no problem but when it got my turn I was searched 3 times in a vigorous harsh manner and he dropped my bag two times. Inmates waiting on me to catch up to them noticed this clearly and THEY brought it to my attention. They were astonished.

On Aug 14 07 my first morning on the compound the first CO who seen me asked for my ID and appeared to know me. After leaving and going to my unit I called my mother and a CO said hang up now and go to the lieutenants office. He made me hang up on my mother. In the lieutenants office I was told I belong in the SHU and to wait on the outside bench. I waited from 7 30-10 30am in the very hot sun. Then a CO came out and said go to your unit your not going to the SHU yet. STAFF TO PUT ME IN THE SHU!! NOW THIS IS PART OF THE HELL I GO THROUGH WHEN I DID NOT DO ANYTHING I MAY NEVER TO MISTAKINGLY DO ANYTHING WRONG BECAUSE ONLY ALLAH WILL KNOW WHAT THESE PEOPLE WILL DO TO ME IF I DO SOMETHING WRONG. I asked this treatment halt! This is the result of a memo superiors sent to the entire staff warning about me. I asked because of that that I be transferred to a camp when my custody requires me to be or if they want to continue in their tactics that they re-investigate what they have on me which I never presented my side of the story.

This here is a mere sample of what I go through there were many more searches and alcohol tests before and after I spoke to the warden.

I ASK that no retaliatory tactics be used against me for filing this against this discriminatory staff.

DATE

Signature

NUMBER: TRV-1330.13 (h)
 DATE: March 28, 2006
 SUBJECT: ADMINISTRATIVE REMEDY
 PROCEDURES FOR INMATES

ATTACHMENT A

INFORMAL RESOLUTION - ADMINISTRATIVE REMEDY (BP-8)

TO: Miller-Kelley (Unit Counselor)
Mr. Brown (Unit)

1. Briefly state your complaint. Include all details and facts which support your request and the date on which the complaint occurred.

- 1) I keep getting stopped for the alcohol test. 1
 2) Officer Summerfield in LOA used to harass me by refusing to give me toilet paper. Taking away a bandage I was given by medical to wrap my hand and telling me he will give me a green bag to the hole when I asked for one to get my property. (2nd Page attached)

2. What action are you requesting to resolve your complaint?

That officers involved in this complaint be fired and reprimanded and that harassment cease immediately.

3. What have you done and who have you spoken to regarding your complaint?
 Higerson and Joslin but it only made things worse.

Inmate Name _____ Register No.: _____

Unit _____

RETURN THE COMPLETED FORM TO YOUR COUNSELOR

DO NOT WRITE BELOW THIS LINE

4. RESPONSE BY STAFF MEMBER

Date Received From Inmate 2/5/08

You are giving supplies as other are
element

Responding Staff Member Name/Title _____ Date _____

Unit Manager Signature Mike Kelly Date Reviewed 2/15/08

Date Returned to Inmate _____

Administrative Remedy (BP-9) Requested or Issued: Yes _____ No _____

REJECTION NOTICE - ADMINISTRATIVE REMEDY

DATE: MARCH 12, 2008

FROM: ADMINISTRATIVE REMEDY COORDINATOR
THREE RIVERS FCI

TO : AHMAD MUSA JEBRIL, 31943-039
THREE RIVERS FCI UNT: LIVE OAK QTR: L01-121U
P.O. BOX 4000
THREE RIVERS, TX 78071

FOR THE REASONS LISTED BELOW, THIS ADMINISTRATIVE REMEDY REQUEST
IS BEING REJECTED AND RETURNED TO YOU. YOU SHOULD INCLUDE A COPY
OF THIS NOTICE WITH ANY FUTURE CORRESPONDENCE REGARDING THE REJECTION.

REMEDY ID : 485692-F1 ADMINISTRATIVE REMEDY REQUEST
DATE RECEIVED : MARCH 12, 2008
SUBJECT 1 : OTHER COMPLAINT AGAINST STAFF
SUBJECT 2 :
INCIDENT RPT NO:

REJECT REASON 1: YOUR APPEAL IS UNTIMELY. REGIONAL APPEALS (BP-10)
MUST BE RECEIVED WITHIN 20 DAYS OF THE WARDEN/CCM
RESPONSE OR RECEIPT OF THE DHO REPORT. THIS TIME
INCLUDES MAIL TIME.

Type or use ball-point pen. If attachments are needed, submit four copies. Additional instructions on reverse.

From: Jebril, Ahmad 31943-039 LOA Three Rivers, F
LAST NAME, FIRST, MIDDLE INITIAL REG. NO. UNIT INSTITUTION

Part A- INMATE REQUEST On Sunday 8/26/07 after dinner around 6:00pm a CO who I was informed may be a lieutenant stopped me searched me and told me to hold my han in a stretched out position, I complied.

He found 3 pages dated that same day printed off the internet as he was invest gating them and handing them over to a CO next to him (female who I think is a lieutenant) I dropped my hands because I got tired.

He asked CO'S next to him if I was allowed to have access to the internet, and if I could have internet papers.

He asked them how I got it.

As he did so he noticed I dropped my hands so he said(Did I tell you to put th down) as I put them to rest them.

He was speaking belligerantly and in a disrespectful way.

Then after the disrespectful manner and rudeness he asked me where I got them and where I got access to the net.

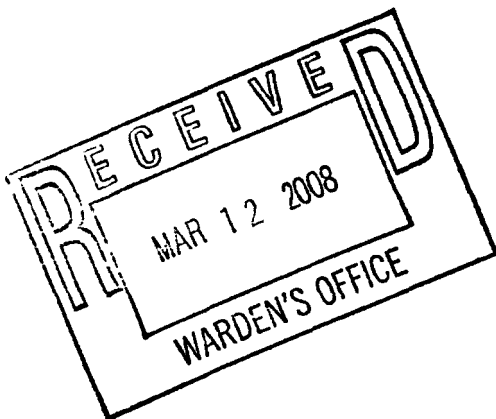
I said I was just in Chaplain Noble's office and she printed them for me.(name of Islamic vedios she ordered).

I've been targetted since the day I hit the compound for excessive searches

2/22/08
DATE

[Signature]
SIGNATURE OF REQUESTER

Part B- RESPONSE



DATE

WARDEN OR REGIONAL DIRECTOR

If dissatisfied with this response, you may appeal to the Regional Director. Your appeal must be received in the Regional Office within 20 calendar days of the date of this response.

ORIGINAL: RETURN TO INMATE

CASE NUMBER: 485692-FI

CASE NUMBER: _____

Part C- RECEIPT

Return to: _____
LAST NAME, FIRST, MIDDLE INITIAL REG. NO. UNIT INSTITUTION

SUBJECT: _____

DATE

RECIPIENT'S SIGNATURE (STAFF MEMBER)